

WHISTLEBLOWER POLICY – Procedure for Handling of Complaints

OBJECTIVE: To provide a company process for documenting and approving all mandates, procedures and responsibilities for addressing complaints received through the formal whistle-blowing process or through alternate methods.

COVERED PERSONS: Lithium Americas Corp. (“LAC”), its subsidiaries and the Cauchari-Olaroz lithium project company Minera Exar S.A., collectively referred to as the “Company”)

OVERVIEW OF PROCESSES AND PROCEDURES

Management:

1. are required to report all complaints, in whatever method received and from whomever initially received, from employees, customers, partners and third party suppliers (the “Reporter(s)”) to the Audit Committee Chair of LAC in writing within forty-eight (48) hours; and
2. are required to report to the Audit Committee Chair of LAC any suspected or known instances of fraud and/or misconduct and/or management override they become aware of in the course of conducting their duties.

Audit Committee Chair:

1. will receive all complaints from any Reporters(s), in whatever method sent and to whomever initially sent;
2. will confer with the CEO and Corporate Secretary of LAC to determine the liaison person who will coordinate information gathering for any complaint that is unrelated to accounting, audit or internal controls matters;
3. is responsible for administering a Whistle-Blower log (in substantially the form attached) of complaints or concerns brought directly by a Reporter or reported through any method used by a Reporter. The Whistle-Blower log is to be maintained either by the Audit Committee Chair or by a third-party under the supervision of the Audit Committee Chair;
4. is responsible for approving the contents of the Whistle-Blower log;
5. is responsible for overseeing, coordinating and monitoring the investigation of complaints; will maintain contact or if appropriate, assign someone to maintain contact with the Reporter; and
6. will, on a confidential basis, directly or indirectly through the Corporate Secretary of LAC, retain and maintain records of all documentation of any incident that is reported, including but not limited to written materials, reports, e-mail correspondence and notes of telephone discussions and interviews, etc.

If a complaint is made about or related to the person serving as the Audit Committee Chair, the complaint will be directed to the Chair of the Board. The Chair of the Board will be responsible for handling such complaint(s) and, together with the CEO of LAC, for assigning a person to investigate such complaint(s) and then report back to the Chair of the Board. The Chair of the Board will report the results of investigation of the complaint to the Board.

Argentina Ombudsman:

1. any independent legal advisor in Argentina who is engaged on a consulting basis to provide ombudsman services will receive all complaints from any Reporter(s) in Argentina, in whatever method sent and to whomever initially sent;
2. is responsible for overseeing, coordinating and monitoring the investigation of complaints involving LAC's operations in Argentina;
3. will coordinate information gathering for any complaint excluding one related to accounting, audit or internal controls matters, or any complaints involving the Argentina Ombudsman;
4. for complaints related to accounting or internal control matters only, will confer with the Audit Committee Chair to determine which person will coordinate an investigation of such matter, and will provide information to such person and assist with the investigation as needed;
5. will maintain contact or if appropriate, assign someone to maintain contact with the Reporter;
6. will, on a confidential basis, provide records of all documentation of any incident that is reported to the Audit Committee Chair, including but not limited to written materials, reports, e-mail correspondence and notes of telephone discussions and interviews, etc.; and
7. will, at the request of the Audit Committee Chair, provide an update to any joint venture partner of the Company concerning the outcome of any investigation of a complaint by a Reporter and the actions taken by the Company to resolve the complaint.

Employees of the Company:

1. Employees, officers, directors and consultants of the Company are expected to cooperate in any investigation conducted under this policy. Anyone involved in the investigation is expected to keep confidential any information they become aware of as a participant of the investigation, including the nature of the complaint, the allegations involved, the identity of any person alleged or known to be involved and any outcome.

Investigation Process:

1. The process for an investigation will be determined based on the facts involved in each instance, but will generally include discussions with the complainant (unless the complaint was made anonymously), the party against whom the allegations were made, and any witnesses.
2. If as a result of an investigation, the Company determines that any employee, officer, director or consultant has engaged in conduct or actions that amount to discrimination, harassment or retaliation in contravention of this policy, the Company will take timely corrective action up to and including termination of employment or consulting services.

REPORTING PROTOCOL AND NO RETALIATION

The Audit Committee Chair of LAC will provide a confidential report to the Audit Committee on a quarterly basis. The report will list all complaints received in the quarter, any unresolved complaints still outstanding from the previous quarters and the steps taken to investigate and conclude each matter.

It is the Company's policy to ensure that concerned persons can communicate freely under this policy and be protected from any form of direct or indirect retaliation, including adverse employment consequences such as discharge, suspension, demotion, harassment or discrimination. Every employee, officer, director or consultant of the Company who legitimately and in good faith submits a complaint will be protected by the Company against any retaliation because of that activity. However, since such allegation of impropriety may result in serious personal repercussions for the target person or entity, the person making the allegations of impropriety should have reasonable grounds before filing a report and should undertake such reporting in good faith and in the best interests of the Company, and not for personal gain or motivation. Nothing in this policy will be construed so as to protect a person from the consequences of their own wrongdoing; however, a person's self-disclosure of wrongdoing that is not independently discovered through investigation will be taken into account when considering the consequences to the wrongdoer.

If you have a complaint or concern you wish to report, including, but not limited to a complaint or concern of a potential breach of the Company's Code of Business Conduct and Ethics, you may do so using any of the following options:

1. **Website:** www.lighthouse-services.com/lithiumamericas

2. **Toll-Free Telephone:**

Direct Dial

- o English speaking USA and Canada: **1-833-480-0010**
- o Spanish speaking USA and Canada: **1-800-216-1288**
- o French speaking Canada: **1-855-725-0002**
- o Spanish speaking Mexico: **01-800-681-5340**

AT&T USADirect

- o **All other countries: +800-603-2869** (must dial country access code first [click here](#) for access codes and dialing instructions)

3. **E-mail:** reports@lighthouse-services.com (must include company name with report)

4. **Fax:** **1-215-689-3885** (must include company name with report)

